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June 28, 2024

VIA ECF

The Honorable Valerie Figueredo
United States District Court
Southern District of New York
500 Pearl Street, Courtroom 17A
New York, New York 10007

Re: Pierre v. City of New York, et al., No. 1:20-cv-05116-ALC-VF

Dear Judge Figueredo:

We write on behalf of Plaintiffs and Defendants Duane Reade Inc., the City of New York, and the New York City Police Department to request a (60) day extension of the deadline to submit a finalized Settlement to the Court for approval, from July 1, 2024 to August 30, 2024. ECF No. 439.

The parties have reached an agreement in principle and have finished negotiating the majority of the terms of the settlement agreement. However, the parties still need to draft and negotiate the supplementary settlement papers such as the multiple versions of the settlement notice forms, the claims forms, and the settlement motion papers. Additionally, Duane Reade's lead counsel James Looby recently withdrew from the case which has caused delays in the review and negotiation process. The parties are working diligently but need additional time to complete their negotiations and finalize all papers. This is the parties' fifth request for an extension of this deadline.

We thank the Court for its time and attention to this matter.

SO ORDERED:

HON. ANDREW L. CARTER, JR.
UNITED STATES DISTRICT JUDGE

Dated: July 1, 2024

Respectfully submitted,

Innessa M. Huot